

# **EXHIBIT 12**

1  
2  
3 **UNITED STATES DISTRICT COURT**  
4 **SOUTHERN DISTRICT OF CALIFORNIA**  
5

6 SHYRIAA HENDERSON, on behalf of  
7 herself and all others similarly situated,

8 Plaintiff,

9 vs.

10 UNITED STUDENT AID FUNDS, INC.  
11 D/B/A USA FUNDS et al.,

12 Defendants.  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

CASE NO. 3:13-cv-1845-JLS-BLM

**DECLARATION OF LAURENCE H.  
SIEGEL**

1 I, LAURENCE H. SIEGEL, declare:

2 1. My name is Laurence H. Siegel. I am the Executive Vice President of Product  
3 Development for LiveVox, Inc. ("LiveVox"). I make this declaration based on my  
4 personal knowledge and my review of business records maintained by LiveVox. I am  
5 over the age of eighteen (18) years, am of sound mind, have personal knowledge of the  
6 facts and matters set forth herein unless noted as based on information and belief and  
7 such are true and correct to the best of my knowledge.

8 2. LiveVox has provided certain cloud-based call-center services to non-party  
9 Windham Professional, Inc. ("Windham"), including during the time period from August  
10 2008 to November 2013.

11 3. LiveVox has retained call records for calls made by Windham using one or more  
12 of LiveVox's systems. The call records have been archived and are not readily accessible  
13 in the ordinary course of LiveVox's business operations. The approximate cost to search,  
14 process, and produce the records of all calls made by Windham using the LiveVox  
15 platform is \$800 to \$1,000 per month searched.

16 I declare under penalty of perjury under the laws of the United States that the  
17 foregoing is true and correct.

18 Executed on this 20 day of April, 2016 in San Francisco, California.

19 By: 

20 LAURENCE H. SIEGEL  
21  
22  
23  
24  
25  
26  
27  
28